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Attorneys for GOOGLE LLC

13 UNITED STATES DISTRICT COURT
14
15 NORTHERN DISTRICT OF CALIFORNIA
16
17 SAN FRANCISCO DIVISION

16 SONOS, INC.,
17
18 Plaintiff,

19 vs.

20 GOOGLE LLC,
21
22 Defendant.

Case No. 3:20-cv-06754-WHA
Consolidated with Case No. 3:21-cv-07559-
WHA

**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS RESPONSE TO
SONOS, INC.'S BRIEF REGARDING
THE PARTIES' POSITIONS ON
STANDALONE MODE**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
7 Seal Portions of its Response to Sonos, Inc.’s (“Sonos”) Brief Regarding the Parties’ Positions on
8 Standalone Mode (“Response”). If called as a witness, I could and would testify competently to the
9 information contained herein.

10 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1	Portions outlined in red boxes	Google
Exhibit 2	Portions outlined in red boxes	Google

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16 4. The portions sought to be sealed contain references to Google’s confidential business
17 information and trade secrets, including source code and details regarding architecture and technical
18 operation of Google’s products and functionalities that Sonos accuses of infringement. The specifics
19 of how these functionalities operate is confidential information that Google does not share publicly.
20 Thus, public disclosure of such information could lead to competitive harm to Google as competitors
21 could use these details regarding the architecture and functionality of Google’s products to gain a
22 competitive advantage in the marketplace with respect to their competing products. I understand the
23 Court has sealed similar information before. *See* Dkt. 334 at 5.

24 I declare under penalty of perjury under the laws of the United States of America that to the
25 best of my knowledge the foregoing is true and correct. Executed on May 16, 2023, in San Francisco,
26 California.

1 DATED: May 16, 2023

2 By: /s/ Nima Hefazi

3 Nima Hefazi

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ATTESTATION

I, Sean Pak, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: May 16, 2023

/s/ Sean Pak

Sean Pak